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JAMES R. BROWNING, CLERK

No. 75

In the Supreme Court of the United States

OCTOBER TERM, 1950

NATIONAL LABOR RELATIONS BOARD, PETITIONER

v.

LOCAL 357, INTERNATIONAL BROTHERHOOD OF TEAMSTERS,
CHAUFFEURS, WAREHOUSEMEN AND HELPERS OF AMERICA

CROSS PETITION FOR A WRIT OF CERTIORARI TO THE UNITED
STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA
CIRCUIT

REPLY MEMORANDUM FOR LOCAL 357, INTERNATIONAL
BROTHERHOOD OF TEAMSTERS, CHAUFFEURS,
WAREHOUSEMEN AND HELPERS OF AMERICA

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In the Supreme Court of the United States

OCTOBER TERM, 1959

No. 929

NATIONAL LABOR RELATIONS BOARD, PETITIONER

v.

LOCAL 357, INTERNATIONAL BROTHERHOOD OF TEAMSTERS,
CHAUFFEURS, WAREHOUSEMEN AND HELPERS OF AMERICA

CROSS PETITION FOR A WRIT OF CERTIORARI TO THE UNITED
STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA
CIRCUIT

REPLY MEMORANDUM FOR LOCAL 357, INTERNATIONAL BROTHERHOOD OF TEAMSTERS, CHAUFFEURS, WAREHOUSEMEN AND HELPERS OF AMERICA

The question presented in this Cross-Petition is substantially as set forth by Petitioner in such Cross-Petition. As there indicated, the decision of the Court of Appeals for the District of Columbia respecting the invalidity of the so-called Brown-Olds remedy is consistent with decisions of the Second, Third, Fifth and Ninth Circuits but is in conflict with decisions of the Seventh Circuit. Because of such conflict, which only this Court can resolve, and because of the importance of the question involved in the administration of the National Labor Relations Act, as amended, the Respondent Local 357, International Brotherhood of Teamsters, Chauffeurs, Warehousemen and Helpers of America,

does not oppose the grant of the instant Petition, although it believes the decision of the Court of Appeals below respecting the invalidity of the Brown-Olds remedy to be a correct one,

Respectfully submitted,

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